

Message

---

**From:** Roewer, James [JRoewer@eei.org]  
**Sent:** 6/2/2017 11:38:39 AM  
**To:** Johnson, Barnes [Johnson.Barnes@epa.gov]  
**Subject:** 257.93

Hi Barnes – I just wanted to give you an update on where USWAG stands in collecting information regarding the potential effects on power generation if the CCR rule's alternative closure provision is not amended to allow for the consideration of non-CCR wastewaters managed in unlined CCR surface impoundments. We've made progress in collecting this information and should have some hard data to you next week.

Thus far, we have identified the universe of unlined CCR surface impoundments that would be subject to forced closure if the units exceed an applicable groundwater protection standard. I am now working with EEI's reliability group to quantify, on a regional basis, the potential impact of the loss of generating capacity that would occur if the generating stations at which these unlined impoundments are located would have to cease the generation of power. I believe this is the information that we discussed providing to you at our recent meeting.

This continues to be a critically important issue for the power industry and we appreciate your office working with us in assembling the information needed to move forward to amend the alternative rule provision to also account for non-CCR wastewaters.

Regards,

Jim

Jim Roewer  
Executive Director  
USWAG



c/o Edison Electric Institute  
701 Pennsylvania Avenue, NW  
Washington, DC 20004-2696  
202-462-5645  
[www.uswag.org](http://www.uswag.org)